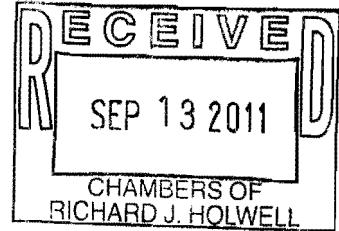


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK



DEUTSCHE BANK TRUST COMPANY,  
AMERICAS, in its capacity as successor indenture  
trustee for certain series of Senior Notes, LAW  
DEBENTURE TRUST COMPANY OF NEW  
YORK, in its capacity as successor indenture  
trustee for certain series of Senior Notes, and  
WILMINGTON TRUST COMPANY, in its  
capacity as successor indenture trustee for certain  
series of PHONES Notes

X

Docket No. 11-cv-04784

**STIPULATION**

Plaintiffs,

vs.

ADALY OPPORTUNITY FUND TD  
SECURITIES INC. C/O ADALY INVESTMENT  
MANAGEMENT CO., *et al.*

Defendants.

X

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: 9/21/11  
DATE FILED: 9/21/11

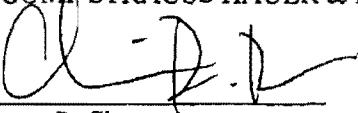
IT IS HEREBY STIPULATED AND AGREED by and among the undersigned that:

1. Defendant Robert E. La Blanc shall have up to and including October 20, 2011 to answer, move or otherwise respond to the amended complaint herein, subject to any stay of proceedings which may then be in effect;
2. Said defendant waives any defenses relating to service of process, but otherwise reserves any and all available defenses; and
3. Electronically transmitted or facsimile signatures on this stipulation shall be deemed as originals for all purposes.

Dated: September 12, 2011

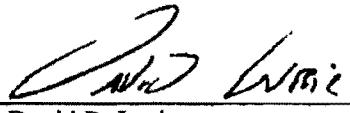
AKIN GUMP STRAUSS HAUER & FELD  
LLP

By:

  
James P. Chou  
Christine D. Doniak  
One Bryant Park  
New York, New York 10036  
(212) 872-1000

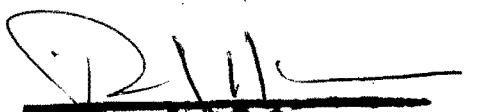
*Counsel for Plaintiffs*

By:

  
David R. Lurie  
10 East 40<sup>th</sup> Street, Suite 3307  
New York, New York 10016  
(347) 651-0194

*Counsel for Defendant Robert E. La Blanc*

**SO ORDERED:**

  
**U.S.D.J.**  
9/17/11